

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

**WIDALLYS RIVERA QUIÑONES on  
behalf of her minor child, A.V.R.,**

**Plaintiff,**

**v.**

**Case No. 3:15-cv-02249-JAF**

**DDR CARIBBEAN PROPERTY  
MANAGEMENT LLC, DDR DEL  
SOL LLC,**

**Defendant.**

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**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO  
COMPLAINT AND INCORPORATED MEMORANDUM OF LAW**

Defendants, DDR CARIBBEAN PROPERTY MANAGEMENT LLC and DDR DEL SOL LLC, move this Court for an Order extending the time they must serve a response to the Complaint of Plaintiff, WIDALLYS RIVERA QUIÑONES, up to and including October 30, 2015, based upon the following:

1. Plaintiff filed this action against Defendants alleging that certain facilities owned and/or operated by them fail to comply with the Americans with Disabilities Act and its implementing regulations.

2. Defendants were served with process on September 29, 2015. Unless the Court extends the deadline, Defendants will be required to serve their responses to the Complaint on October 20, 2015. To properly respond to the Complaint, Defendants, their consultants or attorneys may be required to visit and analyze the location forming the basis of this action.

3. Additionally, the parties would like the opportunity to engage in settlement discussions and would like additional time to explore settlement without further expense or the use of judicial resources.

4. Under Federal Rule of Civil Procedure 6(b), this Court is authorized to extend the period within which Defendants must respond to the Complaint “if request therefore is made before the expiration of the period originally prescribed.” Defendants have filed their request timely under Rule 6(b).

6. Defendants submit that this request for an extension is sought in good faith and not for the purpose of undue delay, but in the interest of justice.

7. Based on the foregoing, Defendants request an extension of time within which to respond to the Complaint, which would re-set the deadline for serving their responses up to and including October 30, 2015.

8. The undersigned contacted counsel for the Plaintiff, and he does not oppose the relief requested by Defendants.

**WHEREFORE**, Defendants, DDR CARIBBEAN PROPERTY MANAGEMENT LLC and DDR DEL SOL LLC, request that this Court enter an Order extending the time within which they must serve their response to the Complaint up to and including October 30, 2015.

Dated: October 20, 2015.

Respectfully submitted,

/s/ Carlos M. Hernández Burgos, Esq.  
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DDR CARIBBEAN PROPERTY MANAGEMENT  
LLC and DDR DEL SOL LLC

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 20, 2015, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to Jose Carlos Velez-Colon, Esq. at [jcvelezcolon@gmail.com](mailto:jcvelezcolon@gmail.com).

/s/ Carlos M. Hernández Burgos, Esq.